

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2019-170-E**

In the Matter of:)	
)	PETITION TO INTERVENE
Duke Energy Carolinas, LLC's Establishment)	OF THE NORTH
of Net Energy Metering Tariff in Compliance)	CAROLINA SUSTAINABLE
with H. 3659)	ENERGY ASSOCIATION

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), the North Carolina Sustainable Energy Association ("NCSEA") hereby respectfully petitions to intervene in the above-captioned generic docket. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located and doing business in both North Carolina and South Carolina. NCSEA's mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
2. NCSEA's membership includes businesses that sell, install, and lease customer-sited solar generation in Duke Energy Carolinas, LLC's service territory in both North Carolina and South Carolina, whose businesses will be directly impacted by the outcome of this proceeding. Additionally, NCSEA's membership includes individuals and businesses who have installed or leased customer-sited solar generation, who will also be directly impacted by the outcome of this proceeding.

3. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

4. The name and principal business address of the Petitioner are:

North Carolina Sustainable Energy Association
4800 Six Forks Road
Suite 300
Raleigh, NC 27609

5. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, NCSEA is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina: and requests that undersigned counsel be added to the official service list:

Jeffrey W. Kuykendall
Attorney at Law
South Carolina Bar No. 102538
127 King St., Ste. 208
Charleston, SC 29401
Phone: 843.790.5182
Facsimile: 866.733.1909
Jwkuykendall@jwklegal.com

6. NCSEA consents to service via electronic mail and requests that all communications regarding this docket should be directed to NCSEA's counsel of record, with copies to:

Peter H. Ledford
General Counsel and Director of Policy
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4800 Six Forks Road, Suite 300
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peter@energync.org

7. NCSEA has a substantial interest in the subject matter of this proceeding. NCSEA has been an active participant in the ongoing procedural discussions and stakeholder technical workshops and has attended the stakeholder workshops held on March 12, 2020 and April 23, 2020 and will be participating in the substantive discussions as appropriate. Further, NCSEA has been allowed to intervene in Docket No. 2019-182-E regarding net energy metering.

8. No other party will adequately represent NCSEA's interest in this case.

WHEREFORE, for the reasons set forth above, NCSEA respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted,

/s/ Jeffrey W. Kuykendall
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Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the __27th__ day of July, 2020.

/s/ Jeffrey W. Kuykendall
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